FCRHA POLICY STATEMENT ON MAINTAINING REASONABLE INCOME MIX WITHIN PUBLIC HOUSING PROGRAM DEVELOPMENTS (DECONCENTRATION OF POVERTY)

<u>Purpose</u>

Section 16 (a) of the United States Housing Act, as amended by Section 513 of the Quality Housing and Work Responsibility Act of 1998, prohibits a Public Housing Authority (PHA) from concentrating very low-income families, or other families with relatively low-incomes, in certain public housing projects, or certain buildings within projects. The Act also provides that 40 percent of all new admissions in public housing shall be families whose income at the time of their admission does not exceed 30 percent of the median income for the area. The PHA's admission policy may establish and utilize income-mix criteria designed to avoid concentration of very low income families in certain public housing developments and to ensure income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects.

Under HUD's final rule dated October 21, 1999, on preparing the 5-Year and Annual Plans, PHAs are considered to be in compliance with the Act's income mixing requirements (avoiding the concentration of poverty) if they determine the average incomes of families in their developments, defining high income developments as those with family incomes over 115 percent of the average and low income developments as those with family incomes under 115 percent of the average. Problem developments are dealt with by either admitting higher income tenants where the development has lower income levels and lower income tenants where the development has higher income levels.

In reviewing the FCRHA's existing admission policy for public housing, the Department of Housing and Community Development (HCD) analyzed the profiles of all public housing families being served as of January 31, 2000, to determine how tenant income levels compare at each of FCRHA's project developments. Table 1 on page 4 presents the results of this analysis.

Current Policy Statement and Results of Analysis

The current policy statement of the FCRHA Public Housing Admissions and Occupancy Policy is that HCD must avoid concentrations of the most economically and socially deprived families in any one or all of the FCRHA's public housing projects. The policy does not provide for incentives to bring higher income tenants into lower income project areas and lower income tenants into higher income project areas. HCD found that the income levels for families in FCRHA public housing developments generally show adequate income mixing in conformance with FCRHA's Admissions and Occupancy policy. FCRHA's standards for tenant selection for public housing developments states

that the Authority follows nondiscriminatory policies in the assignment of applicants to dwelling units.

The FCRHA has 27 elderly and family developments in its public housing inventory. One development, the Audubon Apartments, has 46 efficiency and one-bedroom units almost exclusively dedicated to elderly families. Other developments such as the Belle View Apartments have one bedroom units for which priority is given to elderly and other families whose incomes are for the most part fixed and in the very low income category. For this reason, we have excluded from our income mix analysis the Audubon units as well as all one-bedroom units in the public housing inventory.

The results of our analysis, which is presented in the following chart, showed that the average public housing household income of all families occupying two-bedroom units and larger is about \$15,030. In addition, there are 5 higher income developments where HCD needs to admit more lower income families and 6 lower income developments where HCD needs to admit more higher income families.

FCRHA PUBLIC HOUSING DEVELOPMENTS AFFECTED BY HUD'S NEW INCOME MIXING GUIDANCE

Average Incomes of All Families Occupying

Two Bedroom Units or Larger as of January 31, 2000	\$15,030
115 Percent Above the Average Income of All Families	\$17,285
115 Percent Below the Average Income of All Families	\$12,776

<u>Higher Income Developments (Need to Admit Lower Income Families)</u>

1.	Heritage I	\$19,402
2.	Robinson Square	18,094
3.	Sheffield Village	20,081
4.	Heritage Woods North	
	Colchester	
	Springfield Green	19,151
5.	Greenwood II	
	Barkley	24,909

Lower Income Developments (Need to Admit Higher Income Families)

1.	Newington Station	\$11,830
2.	Shadowood	12,434
3.	The Atrium	11,255
4.	Heritage Woods South	12,548
5.	Barros Circle	11,793
6.	Old Mill Gardens	11,029

Policy Statement

Based on HUD's October 21, 1999, income mixing guidance, the FCRHA income mixing policy statement is being modified to include the following additional measures to the existing standards for tenant selection.

- 1. In order to ensure relative parity among its housing developments, HCD will analyze the income levels of public housing tenants on a continuous six-month timetable to determine the average incomes of families in their developments, defining high income developments as those with family incomes over 115 percent of the average and low income developments as those with family incomes under 115 percent of the average. Problem developments are dealt with by either admitting higher income tenants where the development has lower income levels and lower income tenants where the development has higher income levels.
- 2. HCD will then identify those developments that are more than 115 percent above and below the average income of all families in our developments.
- 3. When a development is identified as having tenant income at 115 percent above or below the average income of all families in our developments as noted in step 2, HCD will implement a tenant selection procedure at the development that will give preference to either placing higher income tenants where the development has lower income tenants and lower income tenants where the development has higher income tenants.
- 4. The effective date for this policy will be admissions taking place after April 15, 2000.

Table I
Concentration of Poverty, Public
Housing
Developments
Developments

		Average	Developments With Average	Developments With Average
	Total	Household	Incomes	Incomes
Development	Units	Income	Above 115 %	Below 115 %
			(Lower Income	(Higher Income
Family Properties			Families Needed)	,
Rosedale Manor	70	\$15,558.70	No	No
Newington Station	36	11,829.69	No	Yes
The Park	24	13,194.09	No	No
Shadowood	16	12,433.75	No	Yes
The Atrium	15	11,254.60	No	Yes
Villages of Falls Church	28	13,521.71	No	No
Heritage I	18	19,401.66	Yes	No
Robinson Square	45	18,094.49	Yes	No
Heritage Woods South	14	12,547.71	No	Yes
Sheffield Village	8	20,080.87	Yes	No
Greenwood	92	14,099.06	No	No
Briarcliff II	19	16,138.21	No	No
West Ford II	22	15,006.46	No	No
West Ford II	24	14,647.08	No	No
West Ford III	59	13,537.49	No	No
Barros Circle	42	11,793.26	No	Yes
Belle View	31	13,826.94	No	No
Kingsley Park	107	14,198.84	No	No
Heritage Woods North		,		
Colchester				
Springfield Green	25	19,151.28	Yes	No
Reston Town Center	31	13,266.06	No	No
Old Mill Gardens	50	11,028.62	No	Yes
Regan Oaks	51	14,331.67	No	No
Tavenner Lane	12	15,826.92	No	No
Water's Edge	9	16,516.44	No	No
The Green	46	14,605.89	No	No
Greenwood II	. •	,000.00		
Barkley	7	24,909.29	Yes	No
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Average Family Incomes	901	\$15,030.80		
115 Percent Above the A	verage	\$17,285		
115 Percent Below the A Income of All Families	verage	\$12,776		

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